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June 8, 2017

**VIA ECF & EMAIL**

Hon. Gregory H. Woods, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

**Re: *Benaissa v. Keep America Great PAC, et al.* Docket No. 16-cv-07796-GHW**

Dear Judge Woods:

We represent all defendants in the above-captioned action (“Defendants”), and write pursuant to Your Honor’s individual rule 1.A and 4.D on behalf of all parties and with Plaintiff’s consent. We write to let the Court know that the parties have just reached a settlement in principal. The parties would respectfully request that the Court stay the case (including decisions on all pending motions) for a period of 90 days while the parties commit their settlement terms to writing. Please let us know if the Court requires any further information.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ *Scott J. Sholder*  
Scott J. Sholder

cc: All Counsel of Record (via ECF & Email)